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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

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:
In re: : Chapter 11
:
THE COLLEGE OF SAINT ROSE, : Case No. 24-11131 (REL)
:
Debtor. ::
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**NOTICE OF INTENT TO SEEK CRAM DOWN
OF FIRST AMENDED CHAPTER 11 PLAN ON CANON FINANCIAL SERVICES INC.
PURSUANT TO LOCAL RULE 3020-1(c)**

The College of Saint Rose (the “Debtor”), by its counsel Cullen and Dykman LLP, hereby provides notice in accordance with Local Bankruptcy Rule 3020-1(c) of its intent to seek cram down of its First Amended Chapter 11 Plan (the “Plan”) on the Class 3 Claimant, Canon Financial Services Inc. (“Canon”).

The facts necessary to establish that the Plan’s treatment of Canon’s claim complies with the applicable provisions of 11 U.S.C. §1129(b) is set forth in the Affidavit of Marcia J. White,

filed of even date herewith.

Dated: Albany, New York
June 24, 2025

CULLEN AND DYKMAN LLP

By: /s/ Bonnie Pollack
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